articles of manufacture, namely, a computer readable medium and an electronic device, respectively. More specifically, independent claim 87 is directed to a computer readable medium which includes as an element thereof a resource matching program, and not to the resource matching program itself. Similarly, independent claim 176 is directed to an electronic device which includes as an element thereof a resource matching program, and not to the resource matching program itself. Thus, it is clear that these claims are not directed to computer programs *per se*.

The portion of the MPEP cited by the Examiner in support of the §101 rejection in fact supports the position of Applicant, by unequivocally stating that "a claimed computer-readable medium," which includes a program stored thereon, is statutory. Claim 87 is a computer readable medium claim of the type specifically designated as statutory in the MPEP. Claim 176 is similarly believed to be statutory.

Accordingly, the §101 rejection is believed to be improper and should be withdrawn.

With regard to the §102(e) rejection, Applicant initially notes that the Manual of Patent Examining Procedure (MPEP), Eight Edition, August 2001, §2131, specifies that a given claim is anticipated "only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference," citing Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Moreover, MPEP §2131 indicates that the cited reference must show the "identical invention . . . in as complete detail as is contained in the . . . claim," citing Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

The present invention as set forth in independent claim 1 is directed to a method for linking at least one client with at least one expert. The method includes, among other steps, the steps of selecting at least one expert from an expert datasource, and linking the expert to the client.

It is important to note that the specification, at page 2, lines 6-9, specifically defines the term "expert" as follows:

> As used throughout the discussion which follows, the term expert will mean a person who has acquired knowledge in a particular subject through formal education, work experience or life's experiences.

Thus, the claim requires the establishment of link between a client and an expert in the form of a person.

Halverson discloses a system in which spoken language queries from a user are processed in order to retrieve information for that user over a network such as the Internet. The disclosed system in Halverson does not involve selecting an expert from an expert datasource, or linking an expert to a client. In fact, the Halverson reference makes no reference whatsoever to selection of or linking to an "expert" as that term is defined in the present specification.

By way of example, the Examiner in formulating the §102(e) rejection argues that the linking step of the claim is met by element 410 in FIG. 4 of Halverson. Applicant respectfully disagrees. Element 410 in Halverson simply transmits retrieved information to a requesting user. See Halverson at column 12, lines 4-8. There is no link whatsoever established in Halverson between the user and an "expert" as the latter term is defined in the specification. Applicant further notes in this regard that the word "expert" apparently is not present anywhere in the disclosure of the Halverson reference, based on a search for that word in an electronic copy of the reference taken from the USPTO online database.

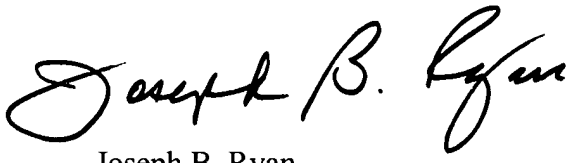
Since claim 1 includes one or more limitations which are not met by Halverson, claim 1 is not anticipated by Halverson.

The dependent claims 2-86 are believed allowable for at least the reasons identified above with regard to independent claim 1.

Accordingly, the §102(e) rejection is believed to be improper and should be withdrawn.

In view of the above, Applicant believes that claims 1-269 are in condition for allowance, and respectfully requests withdrawal of §101 and §102(e) rejections.

Respectfully submitted,



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